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RCRA Review of L.E. Carpenter Site Revised Feasibility Study  
Report

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Contaminants detected in soils at the site include diethylhexylphthalate (DEHP), ethylbenzene, xylene, lead, antimony and PCBs (<50ppm). VOCs and BN compounds were found in the groundwater consistent with soil contamination. Contaminants of concern (COC) for groundwater include DEHP, xylene, and ethylbenzene. COCs for soil include DEHP, lead, antimony and PCBs.

The recommended alternatives for remediation of the site include soil cover for DEHP contaminated soils, excavation, floating layer recovery, and groundwater treatment followed by surface water discharge. Enhanced biological treatment of extracted groundwater followed by using the treated groundwater for soil flushing is also being considered as an option. The addition of surfactants and nutrients to enhance the soil flushing and biodegradation process is being considered as part of this alternative. The revised FS states that the latter option will meet NJDEPE cleanup standards, whereas the soil cover will not result in reduction of contaminant levels in soil, but will result in reducing the risk from the site to the same level as the flushing process over a period of time. RCRA standards pertaining to the recommended alternatives were forwarded to your office on September 1, 1992. These standards are still applicable.

If the risk assessment confirmed that the risk associated with the soil cover option was within acceptable limits, HWFB would have no preference to either option. However, we feel that the flushing and bio-remediation process, if performed in a controlled manner which protects health and the environment, should be considered since it may permanently reduce contamination at the site to NJDEPE cleanup levels over a period of time. Treatment or removal of contamination is preferable to containment if the benefits can be justified.

Please contact Mike Kramer at X8654 if you have any questions concerning this matter.

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